

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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D. JOSEPH KURTZ, Individually and on	:	Civil Action No. 1:14-cv-01142-PKC-RML
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
KIMBERLY-CLARK CORPORATION, et al.,	:	
	:	
Defendants.	:	
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GLADYS HONIGMAN, Individually and on	:	Civil Action No. 2:15-cv-02910-PKC-RML
Behalf of All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
KIMBERLY-CLARK CORPORATION,	:	
	:	
Defendant.	:	
<hr/>		X

**PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION  
SETTLEMENT, CLASS COUNSEL'S APPLICATION FOR AN AWARD OF  
ATTORNEYS' FEES AND EXPENSES AND CLASS REPRESENTATIVE PAYMENTS**

PLEASE TAKE NOTICE that plaintiffs, Dr. D. Joseph Kurtz and Gladys Honigman (“Plaintiffs”), on their own behalf and on behalf of all other Settlement Class Members, through Class Counsel Robbins Geller Rudman & Dowd LLP (“Robbins Geller”), will move this Court on September 7, 2022 at 10:00 a.m., before The Honorable Pamela K. Chen, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for entry of a Final Order and Judgment<sup>1</sup> approving the proposed Settlement as fair, reasonable, and adequate and finally certifying the Settlement Class. Class Counsel will also move this Court for an order awarding the requested attorneys’ fees and expenses, and class representative payments.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiffs submit and are filing herewith: (i) Plaintiffs’ Memorandum of Law in Support of: (1) Plaintiffs’ Motion for Final Approval of Class Action Settlement; (2) Class Counsel’s Application for an Award of Attorneys’ Fees and Expenses; and (3) Class Representative Payments; (ii) the Declaration of Vincent M. Serra in Support of Plaintiffs’ Motion for Final Approval of Class Action Settlement, Class Counsel’s Application for an Award of Attorneys’ Fees and Expenses and Class Representative Payments and exhibits thereto; and (iii) the Declaration of Vincent M. Serra Filed on Behalf of Robbins Geller in Support of Application for Award of Attorneys’ Fees and Expenses and exhibits thereto.

DATED: August 3, 2022

ROBBINS GELLER RUDMAN  
& DOWD LLP  
SAMUEL H. RUDMAN  
VINCENT M. SERRA  
FRANCIS P. KARAM  
WILLIAM A. MASSA

*/s/ Vincent M. Serra*  
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VINCENT M. SERRA

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<sup>1</sup> Plaintiffs submitted a [Proposed] Final Approval Order and Judgment as Exhibit D to the Settlement Agreement. ECF Nos. 432-1, 437.

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